

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

REBECCA FRANCESCATI,	)	
	)	
	)	
	)	
Plaintiff,	)	No. 1:11-cv-05270
	)	
v.	)	
	)	Honorable Blanche M. Manning
STEFANI JOANNE GERMANOTTA	)	Magistrate Judge Jeffrey T. Gilbert
p/k/a LADY GAGA, INTERSCOPE RECORDS,	)	
UNIVERSAL MUSIC GROUP, INC.,	)	ECF CASE
DJ WHITE SHADOW, LLC, and	)	
BRIAN JOSEPH GAYNOR,	)	JURY TRIAL DEMANDED
	)	
Defendant.	)	

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on Tuesday, October 30, 2012, at 9:15 a.m. or as soon thereafter as counsel may be heard, we shall appear before the Magistrate Judge Jeffrey T. Gilbert, in Courtroom 1386, 219 South Dearborn Street, the courtroom usually occupied by him, and shall then and there present the Joint Motion For An Extension Of The Time To Complete Liability Expert Depositions.

Dated: October 25, 2012

<p><u>/s/Christopher W. Niro</u></p> <p>William L. Niro  Christopher W. Niro  NIRO, HALLER &amp; NIRO  181 W. Madison, Suite 4600  Chicago, IL 60602  Tel: (312) 236-0733  wniro@nshn.com  cniro@nshn.com  <b>Attorneys for Plaintiff, Rebecca Francescatti</b></p>	<p><u>/s/Catherine J. Spector</u></p> <p>Charles Ortner  Sandra A. Crawshaw-Sparks  PROSKAUER ROSE LLP  Eleven Times Square  New York, NY 10036  Tel: (212) 969-3000  cortner@proskauer.com  scrawshaw@proskauer.com</p> <p>Steven R. Gilford  Catherine J. Spector  PROSKAUER ROSE LLP  70 West Madison St., Suite 3800  Chicago, IL 60602  Tel: (312) 962-3550  sgilford@proskauer.com  cspector@proskauer.com  <b>Attorneys for Stefani Joanne Germanotta</b></p>
<p><u>/s/Elvis D. Gonzalez</u></p> <p>Elvis D. Gonzalez  ELVIS GONZALEZ, LTD.  Three First National Plaza  70 West Madison St., Suite 1515  Chicago, IL 60602  Tel: (312) 558-9779  egonzalez@elvisgonzalezltd.com  <b>Attorney for DJ White Shadow, LLC</b></p>	<p><u>/s/Bryan E. Curry</u></p> <p>John J. Bullaro, Jr.  Bryan E. Curry  BULLARO &amp; CARTON PC  200 North LaSalle St., Suite 2420  Chicago, IL 60601  Tel: (312) 831-1000  jbullaro@bullarocarton.com  bcurry@bullarocarton.com  <b>Attorneys for Brian Joseph Gaynor</b></p>

<p><u>/s/Andrew H. Bart</u></p> <p>Christopher B. Lay JENNER &amp; BLOCK LLP 353 N. Clark Street Chicago, IL 60654 Tel: (312) 840-7295 clay@jenner.com</p> <p>Andrew H. Bart JENNER &amp; BLOCK LLP 919 Third Avenue – 37th Floor New York, NY 10022-3908 Tel: (212) 891-1600 abart@jenner.com <b><i>Attorneys for UMG Recordings, Inc.</i></b></p>	
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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system on this 25th day of October, 2012.

*/s/ Catherine J. Spector*

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Catherine J. Spector